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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DZ Reserve and Cain Maxwell (d/b/a Max
Martialis), individually and on behalf of
others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:18-cv-04978-JD

**STIPULATION AND [PROPOSED]
ORDER REGARDING MODIFICATION
OF DEADLINE FOR JOINT PROPOSAL
OF CLASS NOTICE**

Hon. James Donato

1 Pursuant to Federal Rules of Civil Procedure 16 and Civil Local Rule 6-2, Plaintiffs DZ
2 Reserve and Cain Maxwell (d/b/a Max Martialis), on behalf of themselves and all others similarly
3 situated (“Plaintiffs”), and Defendant Meta Platforms, Inc. (“Meta”) (collectively, the “Parties”),
4 stipulate to the following modification of the Case Schedule, as jointly submitted by the Parties on
5 January 20, 2025 (ECF No. 461), and entered in this Court’s February 6, 2025 Minute Order (ECF
6 No. 464), seeking to extend the deadline for the Parties’ proposal for dissemination of notice to
7 the class (or motion if the Parties cannot agree) by 14 days, from February 27, 2025 to March 13,
8 2025.

9 WHEREAS, on January 30, 2025 the Parties jointly proposed that the Parties’ joint
10 proposal for dissemination of notice to the class (or motion if the Parties cannot agree) be submitted
11 by February 27, 2025 (ECF No. 461 at 5), which the Court entered in its February 6, 2025 Minute
12 Order (ECF No. 464);

13 WHEREAS, the Parties have been working cooperatively and in good faith, and have made
14 progress towards reaching agreement on key dates and language that are part of the class notice
15 dissemination plan;

16 WHEREAS, the Parties have met and conferred multiple times via both Zoom and email,
17 including on February 7, 13, 14, 18, and 19, 2025. While the Parties have made significant
18 progress, there are several remaining issues to resolve before the Parties can make a joint proposal.
19 In light of these issues, the Parties agreed that a 14-day extension will be necessary to resolve any
20 remaining differences to the greatest extent possible;

21 WHEREAS, the Parties believe that continuing the deadline for filing a joint proposal for
22 dissemination of notice to the class (or Plaintiffs’ motion, if the Parties cannot agree) will not
23 prejudice the class as proposed notice plan will include sufficient time for notice to be disseminated
24 well in advance of the October 14, 2025 trial date and allow for sufficient time for any class
25 member to opt out. The Parties further believe that continuing the deadline will promote efficiency
26 and economy and conserve judicial resources in light of the Parties’ ongoing and productive
27 discussions.

1 Accordingly, **IT IS HEREBY STIPULATED AND AGREED** between the Parties, and
2 subject to Court approval, that the current Case Schedule (ECF No. 464) is modified as follows:
3 the Parties shall file a joint proposal for dissemination of notice to the class (or motion if Parties
4 cannot agree) by March 13, 2025.

5
6 Dated: February 24, 2025

Respectfully Submitted,

8 COHEN MILSTEIN SELLERS & TOLL PLLC

9 By /s/ Geoffrey Graber

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Dated: February 24, 2025

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Attorneys for Defendant Meta Platforms, Inc.

[PROPOSED] ORDER

Based on the stipulation of the parties, it is **ORDERED** that the Case Schedule is modified as follows: the Parties shall file a joint proposal for dissemination of notice to the class (or motion if the Parties cannot agree) by March 13, 2025.

Honorable James Donato

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Joint Statement Regarding Summary Judgment and Mediation. Pursuant to L.R. 5-1(i)(3) regarding signatures, I, Karina Puttieva, attest that concurrence in the filing of this document has been obtained.

Dated: February 21, 2025

/s/ Karina Puttieva
Karina Puttieva